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Attorneys for Plaintiffs
MARX FORD, individually
and as Successor in Interest to the
Estate of Gennie Price, deceased;
RODNEY FORD; MARVIN FORD;
and MORRIS FORD

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

MARX FORD, individually and as Successor)
in Interest to the Estate of Gennie Price,)
deceased; RODNEY FORD; MARVIN FORD;)
and MORRIS FORD,)

Plaintiffs,)

vs.)

REDWOOD SPRINGS HEALTHCARE)
CENTER; SPRUCE HOLDINGS, LLC; and)
DOES 1 to 50, inclusive,)

Defendants.)

Case No. 1:21-cv-00871-NONE-SAB

NOTICE OF MOTION TO REMAND

HEARING:

DATE: August 5, 2021

TIME: 9:30 a.m.

COURTROOM: 4

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Notice is hereby given that on August 5, 2021, at 9:30 a.m., or as soon thereafter as this matter may be heard in Courtroom 4 of the above entitled Court, Plaintiffs, MARX FORD, individually and as Successor in Interest to the Estate of Gennie Price, deceased, RODNEY FORD; MARVIN FORD and MORRIS FORD, will move, and hereby do move, this Court for an Order to Remand this action to the Tulare County Superior Court.

This Motion is made pursuant to 28 U.S.C. § 1447(c), because this Court lacks subject matter jurisdiction and no other basis for federal jurisdiction exists.

1 This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities served
2 and filed herewith, the Proposed Order, all records and papers on file in this action, and any other
3 evidence the Court may consider in ruling on this Motion.

4 This Motion follows meet and confer efforts, including letters and telephone calls between
5 counsel regarding jurisdiction and the Plaintiffs' intent to seek remand of this action. Accordingly,
6 moving parties have complied with the Court's Standing Order to meet and confer. (Doc. 2-1.)

7 Dated: July 1, 2021

BARADAT & PABOOJIAN, INC.

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9 By: /s/ Warren R. Paboojian
10 Warren R. Paboojian
11 Jason S. Bell
12 Attorneys for Plaintiffs
13 MARX FORD; RODNEY FORD;
14 MARVIN FORD; and MORRIS FORD
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